

REMARKS

Claims 38-39, 45-46, 50-51, 57-58, 62-63, 69-70 and 73-79 are pending in the application. Claims 50-51, 57, 62-63, 69, 73-79 are rejected under 35 U.S.C. § 102(e). Paper No. 25, page 2. Claims 38, 39, 45, 50, 51, 57, 62, 63, 69 and 73-79 are rejected under 35 U.S.C. § 103(a). Paper No. 25, pages 4 and 6. Claims 46, 58 and 70 are allowed. Paper No. 25, page 10. Applicants respectfully traverse these rejections for at least the reasons stated below and respectfully request the Examiner to reconsider and withdraw these rejections.

Applicants note that claims 38-39, 50, 62 and 73 were not amended to overcome prior art but to more clearly claim the subject matter. Hence, the amendments made to claims 38-39, 50, 62 and 73 were not narrowing in scope and therefore no prosecution history estoppel arises from the amendments to claims 38-39, 50, 62 and 73. *Festo Corp v. Shoketsu Kinzoku Kogyo Kabushiki Co.*, 62 U.S.P.Q.2d 1705, 1711-1712 (2002); 56 U.S.P.Q.2d 1865, 1870 (Fed. Cir. 2000). Further, the amendments made to claims 38-39, 50, 62 and 73 were not made for a substantial reason related to patentability and therefore no prosecution history estoppel arises from such amendments. *See Festo Corp.*, 62 U.S.P.Q.2d 1705 at 1707 (2002); *Warner-Jenkinson Co. v. Hilton Davis Chemical Co.*, 41 U.S.P.Q.2d 1865, 1873 (1997).

I. REJECTIONS UNDER 35 U.S.C. § 102(e):

The Examiner has rejected claims 50-51, 57, 62-63, 69 and 73-79 under 35 U.S.C. § 102(e) as being anticipated by Miller (U.S. Patent No. 5,805,911).

For a claim to be anticipated under 35 U.S.C. § 102, each and every claim limitation must be found within the cited prior art reference and arranged as required by the claim. M.P.E.P. § 2131.

Applicants respectfully assert that Miller does not disclose "wherein the control program and the processor cooperate, when the control program is executing on the processor, in exercising the predictive widget to supply a predicted default entry for the defined data field, wherein the defined data field is filled with the predictive default entry prior to a user entering a character in the defined data field" as recited in claim 50 and similarly in claim 62. The Examiner cites column 1, lines 33-35; column 9, lines 1-8 and column 12, lines 58-61 of Miller as disclosing the above-cited claim limitation. Paper No. 25, page 11. Applicants respectfully traverse and assert that Miller instead discloses default text completion which refers to filling an entry after the user has typed a character in that entry. Column 1, lines 33-35. For example, Figure 1 and the associated text illustrate that after the user enters characters, e.g., "Pre", in an entry, then the word prediction system may predict the word, e.g., "Predict", the user desires to enter into that field. Miller further discloses that form package 36 sends to the windowing system 34 to display the predicted text in light gray type 18 in the location that the text would be written if entered by the computer user. Column 9, lines 1-5. Miller further discloses that if the computer user indicates that the prediction is correct, the forms package 36 darkens the predicted text and updates the state of the forms package 36 as if the user had typed in the full predicted text. Column 9, lines 5-8. Miller further discloses displaying a pull-down menu containing a prediction list after the user has entered input text 15. Column 12, lines 58-61. Hence, Miller discloses filling an entry in a form with text after the user has entered one or more characters in that entry. Miller does not disclose filling an entry prior to the user entering any character in that entry. Thus, Miller does not disclose all of the limitations of claims 50 and 62, and thus Miller does not anticipate claims 50 and 62. M.P.E.P. § 2131.

Applicants further assert that Miller does not disclose "wherein the control program and the processor cooperate, when the control program is executing on the processor, in selecting a data entry from the predictive list based upon a user selected

weighted determination of the recency and frequency of use of listed data entries" as recited in claim 57 and similarly in claim 69. The Examiner cites column 9, line 26 – column 10, line 43; and column 12, lines 3-38 of Miller as disclosing the above-cited claim limitation. Paper No. 25, pages 3 and 12. Applicants respectfully traverse and assert that Miller instead discloses a prediction system that includes a plurality of prediction modules. Each prediction module may be configured to generate one or more predictions where each prediction generated is associated with a belief factor. The belief factor is an estimate or likelihood that the associated prediction is correct. This language in Miller further discloses that the prediction module manager selects a prediction from all the predictions provided by the prediction modules based on the belief factor. Miller further discloses that the belief factors generated by these prediction modules may be reweighted based on whether or not the accepted prediction was correct. However, this language does not disclose that a data entry from the predictive list is selected based upon a user selected weighted determination of the recency and frequency of use of the listed data entries. Miller does not disclose a user assigning a weight to the recency and frequency of use of the listed data entries. Thus, Miller does not disclose all of the limitations of claims 57 and 69, and thus Miller does not anticipate claims 57 and 69. M.P.E.P. § 2131.

Applicants also respectfully assert that Miller does not disclose "circuitry operable for predicting a default user's choice in an entry in said form prior to said user enters a character in said entry" as recited in claim 73. The Examiner cites column 1, lines 33-40; column 12, lines 58-61 of Miller as disclosing the above-cited claim limitation. Paper No. 25, page 3. Applicants respectfully traverse. As stated above, Miller instead discloses predicting the data that the user will enter in an entry after the user has entered one or more characters in that entry. However, this is not the same as predicting data to be entered in an entry by default prior to the user entering any information in that entry. Thus, Miller does not disclose all of the

limitations of claim 73, and thus Miller does not anticipate claim 73. M.P.E.P. § 2131.

Claims 51, 63 and 74-79 each recite combinations of features including the above combinations, and thus are not anticipated for at least the above stated reasons. Claims 51, 63 and 74-79 recite additional features, which, in combination with the features of the claims upon which they depend, are not anticipated by Miller.

As a result of the foregoing, Applicants respectfully assert that not each and every claim limitation was found within the cited prior art reference and thus claims 50-51, 57, 62-63, 69 and 73-79 are not anticipated by Miller.

II. REJECTIONS UNDER 35 U.S.C. § 103(a):

The Examiner has rejected claims 38, 39 and 45 under 35 U.S.C. § 103(a) as being unpatentable over Miller. Paper No. 25, page 4. The Examiner has further rejected claims 38, 39, 45, 50, 51, 57, 62, 63, 69 and 73-79 as being unpatentable over Capps (U.S. Patent No. 5,666,502) in view of Miller. Paper No. 25, pages 4 and 6. Applicants respectfully traverse these rejections for at least the reasons provided below and respectfully request the Examiner to reconsider and withdraw these rejections.

A. Miller does not teach or suggest the following claim limitations.

Applicants respectfully assert that Miller does not teach or suggest "wherein the control program and the processor cooperate, when the control program is executing on the processor, in exercising the predictive widget to supply a predicted default entry for the defined data field, wherein the defined data field is filled with the predictive default entry prior to a user entering a character in the defined data field" as recited in claim 38. The Examiner cites column 1, lines 33-35; column 9, lines 1-8 and column 12, lines 58-61 of Miller as teaching the above-cited claim limitation.

Paper No. 25, page 11. Applicants respectfully traverse and assert that Miller instead teaches default text completion which refers to filling an entry after the user has typed a character in that entry. Column 1, lines 33-35. For example, Figure 1 and the associated text illustrate that after the user enters characters, e.g., "Pre", in an entry, then the word prediction system may predict the word, e.g., "Predict", the user desires to enter into that field. Miller further teaches that form package 36 sends to the windowing system 34 to display the predicted text in light gray type 18 in the location that the text would be written if entered by the computer user. Column 9, lines 1-5. Miller further teaches that if the computer user indicates that the prediction is correct, the forms package 36 darkens the predicted text and updates the state of the forms package 36 as if the user had typed in the full predicted text. Column 9, lines 5-8. Miller further teaches displaying a pull-down menu containing a prediction list after the user has entered input text 15. Column 12, lines 58-61. Hence, Miller teaches filling an entry in a form with text after the user has entered one or more characters in that entry. Miller does not teach filling an entry prior to the user entering any character in that entry. Therefore, the Examiner has not presented a *prima facie* case of obviousness, since the Examiner is relying upon an incorrect factual predicate in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d. 1453, 1455 (Fed. Cir. 1998).

Applicants further assert that Miller does not teach or suggest "wherein the control program and the processor cooperate, when the control program is executing on the processor, in storing a predictive list and selecting a predicted default entry from the predictive list based on a predetermined algorithm, wherein the defined data field is filled with the predictive default entry prior to a user entering a character in the defined data field" as recited in claim 39. The Examiner cites column 1, lines 33-35; column 9, lines 1-8 and column 12, lines 58-61 of Miller as teaching the above-cited claim limitation. Paper No. 25, page 11. Applicants respectfully traverse and assert that Miller instead teaches default text completion which refers to filling an entry after the user has typed a character in that entry. Column 1, lines 33-35. For

example, Figure 1 and the associated text illustrate that after the user enters characters, e.g., "Pre", in an entry, then the word prediction system may predict the word, e.g., "Predict", the user desires to enter into that field. Miller further teaches that form package 36 sends to the windowing system 34 to display the predicted text in light gray type 18 in the location that the text would be written if entered by the computer user. Column 9, lines 1-5. Miller further teaches that if the computer user indicates that the prediction is correct, the forms package 36 darkens the predicted text and updates the state of the forms package 36 as if the user had typed in the full predicted text. Column 9, lines 5-8. Miller further teaches displaying a pull-down menu containing a prediction list after the user has entered input text 15. Column 12, lines 58-61. Hence, Miller teaches filling an entry in a form with text after the user has entered one or more characters in that entry. Miller does not teach filling an entry prior to the user entering any character in that entry. Therefore, the Examiner has not presented a *prima facie* case of obviousness, since the Examiner is relying upon an incorrect factual predicate in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d. 1453, 1455 (Fed. Cir. 1998).

Applicants further assert that Miller does not teach or suggest "wherein the control program and the processor cooperate, when the control program is executing on the processor, in selecting a data entry from the predictive list based upon a user selected weighted determination of the recency and frequency of use of listed data entries" as recited in claim 45. The Examiner cites column 9, line 26 – column 10, line 43; and column 12, lines 3-38 of Miller as teaching the above-cited claim limitation. Paper No. 25, pages 3 and 12. Applicants respectfully traverse and assert that Miller instead teaches a prediction system that includes a plurality of prediction modules. Each prediction module may be configured to generate one or more predictions where each prediction generated is associated with a belief factor. The belief factor is an estimate or likelihood that the associated prediction is correct. This language in Miller further teaches that the prediction module manager selects a

prediction from all the predictions provided by the prediction modules based on the belief factor. Miller further teaches that the belief factors generated by these prediction modules may be reweighted based on whether or not the accepted prediction was correct. However, this language does not teach that a data entry from the predictive list is selected based upon a user selected weighted determination of the recency and frequency of use of the listed data entries. Miller does not teach a user assigning a weight to the recency and frequency of use of the listed data entries. Therefore, the Examiner has not presented a *prima facie* case of obviousness, since the Examiner is relying upon an incorrect factual predicate in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d. 1453, 1455 (Fed. Cir. 1998).

B. Capps and Miller, taken singly or in combination, do not teach or suggest the following claim limitations.

Applicants respectfully assert that Capps and Miller, taken singly or in combination, do not teach or suggest "wherein the control program and the processor cooperate, when the control program is executing on the processor, in exercising the predictive widget to supply a predicted default entry for the defined data field, wherein the defined data field is filled with the predictive default entry prior to a user entering a character in the defined data field" as recited in claim 38 and similarly in claims 50 and 62. The Examiner cites column 1, lines 33-35; column 9, lines 1-8 and column 12, lines 58-61 of Miller as teaching the above-cited claim limitation. Paper No. 25, page 11. Applicants respectfully traverse and assert that Miller instead teaches default text completion which refers to filling an entry after the user has typed a character in that entry. Column 1, lines 33-35. For example, Figure 1 and the associated text illustrate that after the user enters characters, e.g., "Pre", in an entry, then the word prediction system may predict the word, e.g., "Predict", the user desires to enter into that field. Miller further teaches that form package 36 sends to the windowing system 34 to display the predicted text in light gray type 18 in the location that the text would be written if entered by the computer user. Column 9, lines 1-5.

Miller further teaches that if the computer user indicates that the prediction is correct, the forms package 36 darkens the predicted text and updates the state of the forms package 36 as if the user had typed in the full predicted text. Column 9, lines 5-8. Miller further teaches displaying a pull-down menu containing a prediction list after the user has entered input text 15. Column 12, lines 58-61. Hence, Miller teaches filling an entry in a form with text after the user has entered one or more characters in that entry. Miller does not teach filling an entry prior to the user entering any character in that entry. Therefore, the Examiner has not presented a *prima facie* case of obviousness, since the Examiner is relying upon an incorrect factual predicate in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d. 1453, 1455 (Fed. Cir. 1998).

Applicants further assert that Capps and Miller, taken singly or in combination, do not teach or suggest "wherein the control program and the processor cooperate, when the control program is executing on the processor, in storing a predictive list and selecting a predicted default entry from the predictive list based on a predetermined algorithm, wherein the defined data field is filled with the predictive default entry prior to a user entering a character in the defined data field" as recited in claim 39 and similarly in claims 51 and 63. The Examiner cites column 1, lines 33-35; column 9, lines 1-8 and column 12, lines 58-61 of Miller as teaching the above-cited claim limitation. Paper No. 25, page 11. Applicants respectfully traverse and assert that Miller instead teaches default text completion which refers to filling an entry after the user has typed a character in that entry. Column 1, lines 33-35. For example, Figure 1 and the associated text illustrate that after the user enters characters, e.g., "Pre", in an entry, then the word prediction system may predict the word, e.g., "Predict", the user desires to enter into that field. Miller further teaches that form package 36 sends to the windowing system 34 to display the predicted text in light gray type 18 in the location that the text would be written if entered by the computer user. Column 9, lines 1-5. Miller further teaches that if the computer user indicates that the prediction is correct, the forms package 36 darkens the predicted



text and updates the state of the forms package 36 as if the user had typed in the full predicted text. Column 9, lines 5-8. Miller further teaches displaying a pull-down menu containing a prediction list after the user has entered input text 15. Column 12, lines 58-61. Hence, Miller teaches filling an entry in a form with text after the user has entered one or more characters in that entry. Miller does not teach filling an entry prior to the user entering any character in that entry. Therefore, the Examiner has not presented a *prima facie* case of obviousness, since the Examiner is relying upon an incorrect factual predicate in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d. 1453, 1455 (Fed. Cir. 1998).

Applicants further assert that Capps and Miller, taken singly or in combination, do not teach or suggest "wherein the control program and the processor cooperate, when the control program is executing on the processor, in selecting a data entry from the predictive list based upon a user selected weighted determination of the recency and frequency of use of listed data entries" as recited in claim 45 and similarly in claims 57 and 69. The Examiner cites column 9, line 26 – column 10, line 43; and column 12, lines 3-38 of Miller as teaching the above-cited claim limitation. Paper No. 25, pages 3 and 12. Applicants respectfully traverse and assert that Miller instead teaches a prediction system that includes a plurality of prediction modules. Each prediction module may be configured to generate one or more predictions where each prediction generated is associated with a belief factor. The belief factor is an estimate or likelihood that the associated prediction is correct. This language in Miller further teaches that the prediction module manager selects a prediction from all the predictions provided by the prediction modules based on the belief factor. Miller further teaches that the belief factors generated by these prediction modules may be reweighted based on whether or not the accepted prediction was correct. However, this language does not teach that a data entry from the predictive list is selected based upon a user selected weighted determination of the recency and frequency of use of the listed data entries. Miller does not teach a user

assigning a weight to the recency and frequency of use of the listed data entries. Therefore, the Examiner has not presented a *prima facie* case of obviousness, since the Examiner is relying upon an incorrect factual predicate in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d. 1453, 1455 (Fed. Cir. 1998).

Applicants further assert that Capps and Miller, taken singly or in combination, do not teach or suggest "circuitry operable for predicting a default user's choice in an entry in said form prior to said user enters a character in said entry" as recited in claim 73. The Examiner cites column 1, lines 33-41; column 9, lines 25-45; and column 12, lines 49-62 of Miller as teaching the above-cited claim limitation. Paper No. 25, page 9. Applicants respectfully traverse. As stated above, Miller instead teaches predicting the data that the user will enter in an entry after the user has entered one or more characters in that entry. However, this is not the same as predicting data to be entered in an entry by default prior to the user entering any information in that entry. Therefore, the Examiner has not presented a *prima facie* case of obviousness, since the Examiner is relying upon an incorrect factual predicate in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d. 1453, 1455 (Fed. Cir. 1998).

Claims 51, 63 and 74-79 each recite combinations of features including the above combinations, and thus are patentable for at least the above reasons as well. Claims 51, 63 and 74-79 recite additional features, which, in combination with the features of the claims upon which they depend, are patentable over Capps in view of Miller.

As a result of the foregoing, Applicants respectfully assert that there are numerous claim limitations not taught or suggested in the cited prior art, and thus the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 38, 39, 45, 50, 51, 57, 62, 63, 69 and 73-79 as being unpatentable over Capps in view of Miller.

C. The Examiner has not presented any objective evidence for combining Capps with Miller.

A *prima facie* showing of obviousness requires the Examiner to establish, *inter alia*, that the prior art references teach or suggest, either alone or in combination, all of the limitations of the claimed invention, and the Examiner must provide a motivation or suggestion to combine or modify the prior art reference to make the claimed inventions. M.P.E.P. §2142. The showings must be clear and particular and supported by objective evidence. *In re Lee*, 277 F.3d 1338, 1343, 61 U.S.P.Q.2d 1430, 1433-34 (Fed. Cir. 2002); *In re Kotzab*, 217 F.3d 1365, 1370, 55 U.S.P.Q.2d 1313, 1317 (Fed. Cir. 2000); *In re Dembiczak*, 50 U.S.P.Q.2d 1614, 1617 (Fed. Cir. 1999). Broad conclusory statements regarding the teaching of multiple references, standing alone, are not evidence. *Id.*

The Examiner's motivation for modifying Capps with Miller to supply a predictive default entry for the defined data field, as recited in claim 38 and similarly in claims 50 and 62, is to "automatically select[ing] the highest entry in the list 200 as a default entry into the data field 184, as suggested by Miller." Paper No. 25, pages 6-7. The Examiner's motivation for modifying Capps with Miller to select a predictive default entry from the predictive list based on a predetermined algorithm, as recited in claim 39 and similarly in claims 51 and 63, is to "automatically select[ing] the highest entry in the list 200 as a default entry into the data field 184, as suggested by Miller." Paper No. 25, page 7. The Examiner's motivation for modifying Capps with Miller to select a data entry from the predictive list based upon a user selected weighted determination of the recency and frequency of use of listed data entries, as recited in claim 45 and similarly in claims 57 and 69, is to "automatically select[ing] the highest entry in the list 200 as a default entry into the data field 184, as suggested by Miller." Paper No. 25, page 8. Examiner's motivation for modifying Capps with Miller for predicting a default user's choice in an entry in the form, as recited in claim 73, is "for reducing the list of possible entries to a more

accurate list with only entries which match[ed] the entered characters, thus reducing processing time which is also the goal set forth by Capps (2:4-13)." Paper No. 25, pages 9-10. These motivations are insufficient to support a *prima facie* case of obviousness since they are merely the Examiner's subjective opinion.

Capps teaches a data input technique for a computer that provides the user with a historical list of potential choices for the data input. Abstract.

Miller, on the other hand, teaches a computer-implemented method of providing and selecting multiple text predictions from text entered from multiple windows of a computer system using an application independent text prediction system. Abstract.

The Examiner must submit objective evidence and not rely on his own subjective opinion in support of combining a reference (Capps) which teaches a data input technique for a computer that provides the user with a historical list of potential choices for the data input with a reference (Miller) which teaches a computer-implemented method of providing and selecting multiple text predictions from text entered from multiple windows of a computer system using an application independent text prediction system. *In re Lee*, 61 U.S.P.Q.2d 1430, 1434 (Fed. Cir. 2002). There is no suggestion in Capps of predicting text in an entry after the user has entered one or more characters in that entry. Since the Examiner has not submitted objective evidence for modifying Capps with Miller, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 38-39, 45, 50-51, 57, 62-63, 69 and 73-79. *Id.*

Further, the Examiner must submit objective evidence and not rely on his own subjective opinion in support of modifying Capps to supply a predictive default entry for the defined data field. *Id.* There is no suggestion in Capps of supplying a predictive default entry. Since the Examiner has not submitted objective evidence for

modifying Capps to supply a predictive default entry for the defined data field, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 38, 50 and 62. *Id.*

Further, the Examiner must submit objective evidence and not rely on his own subjective opinion in support of modifying Capps to select a predictive default entry from the predictive list based on a predetermined algorithm. *Id.* There is no suggestion in Capps of selecting a predictive default entry from a list. Since the Examiner has not submitted objective evidence for modifying Capps to select a predictive default entry from the predictive list based on a predetermined algorithm, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 39, 51 and 63. *Id.*

Further, the Examiner must submit objective evidence and not rely on his own subjective opinion in support of modifying Capps to select a data entry from the predictive list based upon a user selected weighted determination of the recency and frequency of use of listed data entries. *Id.* There is no suggestion in Capps of selecting an entry from a list based on a user selected weighted determination. Neither is there any suggestion in Capps of selecting an entry from a list based on a user selected weighted determination of the recency and frequency of use of listed data entries. Since the Examiner has not submitted objective evidence for modifying Capps to select a data entry from the predictive list based upon a user selected weighted determination of the recency and frequency of use of listed data entries, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 45, 57 and 69. *Id.*

Further, the Examiner must submit objective evidence and not rely on his own subjective opinion in support of modifying Capps for predicting a default user's choice in an entry in the form. *Id.* There is no suggestion in Capps of predicting a default user's choice. Since the Examiner has not submitted objective evidence for

modifying Capps for predicting a default user's choice in an entry in the form, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 73-79. *Id.*

Further, the Examiner must submit objective evidence and not rely on his own subjective opinion in support of modifying Capps to automatically select the highest entry in a list as a default entry into the data field (Examiner's motivation). *Id.* The Examiner's motivation appears to have been gleaned from the secondary reference (Miller). This is not evidence as to why one of ordinary skill in the art with the primary reference (Capps) in front of him would have modified the primary reference (Capps) with a secondary reference (Miller). The primary reference (Capps) teaches a data input technique for a computer that provides the user with a historical list of potential choices for the data input. The Examiner must provide evidence as to why one of ordinary skill in the art with the primary reference (Capps) in front of him, which teaches a data input technique for a computer that provides the user with a historical list of potential choices for the data input would be modified with a secondary reference (Miller) which teaches a computer-implemented method of providing and selecting multiple text predictions from text entered from multiple windows of a computer system using an application independent text prediction system. *See In re Lee*, 61 U.S.P.Q.2d 1430, 1433-1434 (Fed. Cir. 2002); *In re Kotzab*, 55 U.S.P.Q.2d 1313, 1318 (Fed. Cir. 2000) Merely stating what the secondary reference teaches is not evidence for combining a primary reference (Capps) with the secondary reference (Miller). *See Id.* Consequently, the Examiner's motivation is insufficient to support a *prima facie* case of obviousness for rejecting claims 38-39, 45, 50-51, 57, 62-63 and 69. *In re Lee*, 61 U.S.P.Q.2d 1430, 1434 (Fed. Cir. 2002).

Further, the Examiner cites to column 2, lines 4-13 of Capps as support for modifying Capps with Miller for predicting a default user's choice in an entry in the form, as recited in claim 73. The cited passage of Capps teaches that a list arranged

in alphabetical order may still be burdensome on the user since the list is generally too long and requires a substantial amount of time for the user to identify the item to be selected. The cited passage of Capps further teaches that there is a need for an improved user interface that allows a user to enter data with a greater ease of use. There is no language in the cited passage as suggesting that Capps be modified for predicting a default user's choice in an entry. There is no language in the cited passage as suggesting to predict what the user will enter in an entry after the user has typed one or more characters in that entry as taught in Miller. Consequently, the Examiner's motivation is insufficient to support a *prima facie* case of obviousness for rejecting claims 73-79. *In re Lee*, 61 U.S.P.Q.2d 1430, 1434 (Fed. Cir. 2002).

As a result of the foregoing, Applicants respectfully assert that the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 38, 39, 45, 50, 51, 57, 62, 63, 69 and 73-79 in view of the cited prior art. M.P.E.P. §2143.

III. ALLOWABLE SUBJECT MATTER:

Applicants appreciate the allowance of claims 46, 58 and 70. Paper No. 25, page 10.

IV. CONCLUSION

As a result of the foregoing, it is asserted by Applicants that claims 38-39, 45-46, 50-51, 57-58, 62-63, 69-70 and 73-79 in the Application are in condition for allowance, and Applicants respectfully request an allowance of such claims. Applicants respectfully request that the Examiner call Applicants' attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining issues.

Respectfully submitted,

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